

United States Courts  
Southern District of Texas  
FILED

MAR 29 2019

David J. Bradley, Clerk of Court

1 Peter Strojnik  
2 2375 East Camelback Road Suite 600  
3 Phoenix, Arizona 85016  
4 Telephone: (602) 524-6602  
5 ps@strojnik.com

6 **UNITED STATES DISTRICT COURT**  
7 **FOR THE SOUTHERN DISTRICT OF TEXAS**  
8 **Houston Division**

9 **CASE NO.:**

10 Peter Strojnik,

11 Plaintiff,

12 vs.

13 Landry's Inc. dba The Post Oak Hotel

14 Defendant.  
15  
16

17 **COMPLAINT**

18 1. Plaintiff brings this action pursuant to the (1) Americans with Disabilities Act, 42  
19 U.S.C. §12101 *et seq.* and corresponding regulations, 28 CFR Part 36 and Department  
20 of Justice Standards for Accessible Design ("ADA"), and (2) common law of  
21 negligence per se.

22 **PARTIES**

23 2. Plaintiff Peter Strojnik is a veteran and a disabled person as defined by the ADA.  
24 3. Plaintiff is a single man currently residing in Maricopa County, Arizona. Plaintiff is  
25 and, at all times relevant hereto has been, legally disabled by virtue of a severe right-  
26 sided neural foraminal stenosis with symptoms of femoral neuropathy, prostate cancer  
27 and renal cancer, degenerative right knee and is therefore a member of a protected  
28 class under the ADA.

- 1 4. Plaintiff suffers from physical impairments described above which impairments  
2 substantially limit his major life activities. Plaintiff walks with difficulty and pain  
3 and requires compliant mobility accessible features at places of public  
4 accommodation. Plaintiff's impairment is constant, but the degree of pain is episodic  
5 ranging from dull and numbing pain to extreme and excruciating agony.
- 6 5. Plaintiff is retired and likes to spend his retirement years traveling the United States.
- 7 6. Defendant, owns, operates leases or leases to a lodging business ("Hotel") located at  
8 1600 W. Loop S., Houston, TX 77027 which is a public accommodation pursuant to  
9 42 U.S.C. § 12181(7)(A).

#### JURISDICTION

- 10 7. District Court has jurisdiction over this case or controversy by virtue of 28 U.S.C. §§  
11 28-1331 and 42 U.S.C. § 12188 and 28 U.S.C. § 1367.
- 12 8. Plaintiff brings this action as a private attorney general who has been personally  
13 subjected to discrimination on the basis of his disability, *see* 42 U.S.C. §12188 and  
14 28 CFR §36.501.
- 15 9. This Court has continuing subject matter jurisdiction by virtue of, *inter alia*,  
16 Plaintiff's claim for equitable nominal damages.
- 17 10. Venue is proper pursuant to 28 U.S.C. § 1391.
- 18 11. The ADAAG violations in this Verified Complaint relate to barriers to Plaintiffs  
19 mobility. This impairs Plaintiff's full and equal access to the Hotel which, in turn,  
20 constitutes discrimination satisfying the "injury in fact" requirement of Article III of  
21 the United States Constitution.
- 22 12. Plaintiff is deterred from visiting the Hotel based on Plaintiff's knowledge that the  
23 Hotel is not ADA or State Law compliant as such compliance relates to Plaintiff's  
24 disability.
- 25 13. Plaintiff intends to visit Defendant's Hotel at a specific time when the Defendant's  
26 noncompliant Hotel becomes fully compliant with ADAAG; just as a disabled  
27 individual who intends to return to a noncompliant facility suffers an imminent injury  
28 from the facility's existing or imminently threatened noncompliance with the ADA, a

1 plaintiff who is deterred from patronizing a hotel suffers the ongoing actual injury of  
2 lack of access to the Hotel.

3 **COUNT ONE**  
4 **Violation of Plaintiff's Civil Rights under the ADA**

5 14. Plaintiff realleges all allegations heretofore set forth.

6 15. By virtue of his disability, Plaintiff requires an ADA compliant lodging facility  
7 particularly applicable to his mobility, both ambulatory and wheelchair assisted.

8 16. Plaintiff intended to visit Houston, Texas for a visit between November 16, 2018 and  
9 November 19, 2018 and therefore, reviewed vacation booking websites as  
10 documented in Addendum A which is by this reference incorporated herein for all  
11 purposes.

12 17. Plaintiff became aware that third party booking websites disclosed general availability  
13 and description of Defendant's Hotel. Third Party booking websites referenced here  
14 are more fully documented in Addendum A which is by this reference incorporated  
15 herein.

16 18. Third party booking websites failed to identify and describe mobility related  
17 accessibility features and guest rooms offered through its reservations service in  
18 enough detail to reasonably permit Plaintiff to assess independently whether  
19 Defendant's Hotel meets his accessibility needs as more fully documented in  
20 Addendum A.

21 19. Third party booking websites also failed to make reservations for accessible guest  
22 rooms available in the same manner as individuals who do not need accessible rooms.  
23 *See Addendum A.*

24 20. Thereafter, Plaintiff became aware that Defendant's 1<sup>st</sup> party booking website failed  
25 to identify and describe mobility related accessibility features and guest rooms offered  
26 through its reservations service in enough detail to reasonably permit Plaintiff to  
27 assess independently whether Defendant's Hotel meets his accessibility needs as more  
28 fully documented. *See Addendum A.*

1 21. Plaintiff also became aware that Defendant's 1<sup>st</sup> party booking website failed to make  
2 reservations for accessible guest rooms available in the same manner as individuals  
3 who do not need accessible rooms. *See* Addendum A.

4 22. Plaintiff thereafter reviewed Defendant's online information relating to accessibility  
5 or lack thereof, including in particular photographs of the amenities at the Hotel all as  
6 more fully documented in Addendum A.

7 23. Online information relating to accessibility or lack thereof disclosed architectural  
8 barriers to accessibility as more fully documented in Addendum A.

9 24. Defendant has violated the ADA by denying Plaintiff equal access to its public  
10 accommodation on the basis of his disability as outlined above and as outlined in  
11 Addendum A.

12 25. The ADA violations described in Addendum A relate to Plaintiff's disability and  
13 interfere with Plaintiff's full and complete enjoyment of the Hotel.

14 26. As a result of the deficiencies described above, Plaintiff declined to book a room at  
15 Defendant's Hotel.

16 27. The removal of accessibility barriers listed above is readily achievable.

17 28. As a direct and proximate result of ADA Violations, Defendant's failure to remove  
18 accessibility barriers prevented Plaintiff from equal access to the Defendant's public  
19 accommodation.

**WHEREFORE**, Plaintiff prays for all relief as follows:

20 A. Relief described in 42 U.S.C. §2000a – 3; and

21 B. Relief described in 42 U.S.C. § 12188(a) and (b) and, particularly -

22 C. Injunctive relief order to alter Defendant's place of public accommodation to  
23 make it readily accessible to and usable by ALL individuals with disabilities;  
24 and

25 D. Requiring the provision of an auxiliary aid or service, modification of a  
26 policy, or provision of alternative methods, to the extent required by  
27 Subchapter III of the ADA; and

28 E. Equitable nominal damages; and

F. For costs, expenses and attorney's fees; and

1 G. All remedies provided for in 28 C.F.R. 36.501(a) and (b).

2  
3 **COUNT TWO**

4 **Negligence**

5 29. Plaintiff realleges all allegations heretofore set forth.

6 30. Defendant had a duty to Plaintiff to remove ADA accessibility barriers so that Plaintiff  
7 as a disabled individual would have full and equal access to the public  
8 accommodation.

9 31. Defendant breached this duty.

10 32. Defendant is or should be aware that, historically, society has tended to isolate and  
11 segregate individuals with disabilities, and, despite some improvements, such forms  
12 of discrimination against individuals with disabilities continue to be a serious and  
13 pervasive social problem<sup>1</sup>.

14 33. Defendant knowingly and intentionally participated in this historical discrimination  
15 against Plaintiff, causing Plaintiff damage.

16 34. Discrimination against individuals with disabilities persists in the use and enjoyment  
17 of critical public accommodations<sup>2</sup>.

18 35. Defendant's knowing and intentional persistence in discrimination against Plaintiff is  
19 alleged, causing Plaintiff damage.

20 36. Individuals with disabilities, including Plaintiff, continually encounter various forms  
21 of discrimination, including outright intentional exclusion, the discriminatory effects  
22 of architectural, overprotective rules and policies, failure to make modifications to  
23 existing facilities and practices, exclusionary qualification standards and criteria,  
24 segregation, and relegation to lesser services, programs, activities, benefits, jobs, or  
25 other opportunities<sup>3</sup>.

26 37. Defendant's knowing and intentional discrimination against Plaintiff reinforces above  
27 forms of discrimination, causing Plaintiff damage.

28 <sup>1</sup> 42 U.S.C. § 12101(a)(2)

<sup>2</sup> 42 U.S.C. §12101(a)(3)

<sup>3</sup> 42 U.S.C. §12101(a)(5)

1 38. Census data, national polls, and other studies have documented that people with  
2 disabilities, as a group, occupy an inferior status in our society, and are severely  
3 disadvantaged socially, vocationally, economically, and educationally<sup>4</sup>.

4 39. Defendant's knowing and intentional discrimination has relegated Plaintiff to an  
5 inferior status in society, causing Plaintiff damage.

6 40. The Nation's proper goals regarding individuals with disabilities are to assure equality  
7 of opportunity, full participation, independent living, and economic self-sufficiency  
8 for such individuals<sup>5</sup>.

9 41. Defendant's knowing, and intentional discrimination has worked counter to our  
10 Nation's goals of equality, causing Plaintiff damage.

11 42. Continued existence of unfair and unnecessary discrimination and prejudice denies  
12 people with disabilities the opportunity to compete on an equal basis and to pursue  
13 those opportunities for which our free society is justifiably famous, and costs the  
14 United States billions of dollars in unnecessary expenses resulting from dependency  
15 and nonproductivity<sup>6</sup>.

16 43. Defendant's knowing and intentional unfair and unnecessary discrimination against  
17 Plaintiff demonstrates Defendant's knowing and intentional damage to Plaintiff.

18 44. Defendant's breach of duty caused Plaintiff damages including, without limitation,  
19 the feeling of segregation, discrimination, relegation to second class citizen status the  
20 pain, suffering and emotional damages inherent to discrimination and segregation and  
21 other damages to be proven at trial.

22 45. By violating Plaintiff's civil rights, Defendant engaged in intentional, aggravated and  
23 outrageous conduct.

24 46. The ADA has been the law of the land since 1991, but Defendant engaged in a  
25 conscious action of a reprehensible character, that is, Defendant denied Plaintiff his  
26 civil rights, and cause him damage by virtue of segregation, discrimination, relegation

---

27 <sup>4</sup> 42 U.S.C. §12101(a)(6)

28 <sup>5</sup> 42 U.S.C. §12101(a)(7)

<sup>6</sup> 42 U.S.C. §12101(a)(8)

1 to second class citizen status the pain, suffering and emotional damages inherent to  
2 discrimination and segregation and other damages to be proven at trial

3 47. Defendant either intended to cause injury to Plaintiff or defendant consciously  
4 pursued a course of conduct knowing that it created a substantial risk of significant  
5 harm to Plaintiff.

6 48. Defendant is liable to Plaintiff for punitive damages in an amount to be proven at trial  
7 sufficient, however, to deter this Defendant and others similarly situated from  
8 pursuing similar acts.

9 **WHEREFORE**, Plaintiff prays for relief as follows:

- 10 A. For finding of negligence; and  
11 B. For damages in an amount to be proven at trial; and  
12 C. For punitive damages to be proven at trial; and  
13 D. For such other and further relief as the Court may deem just and proper.

14 **REQUEST FOR TRIAL BY JURY**

15 Plaintiff respectfully requests a trial by jury in issues triable by a jury.

16 **PETER STROJNIK**

17   
18 Plaintiff  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28



## ADDENDUM A

### AIR TRAVEL + HOTEL

Availability: Fri, Nov 16 - Mon, Nov 19

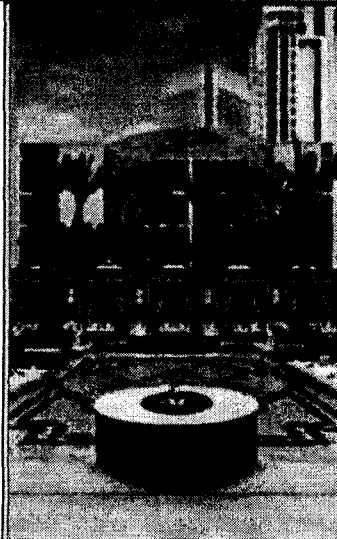
#### Trip Details

FLIGHT (2 roundtrip tickets) + HOTEL (3 nights), taxes & fees

**Total: \$3,026.94**  
(includes 2 travelers)

### ADA VIOLATIONS

THIRD PARTY BOOKING WEBSITE: EXPEDIA.COM



**The Post Oak Hotel at  
Uptown Houston ★★★★★**

**New to Expedia!**

**The Galleria**  
Houston's Only AAA 5 Diamond Hotel  
Houston's most luxurious rooms &  
world-class amenities, highlighted by  
unrivalled attention to detail, in the  
heart of the Galleria

1-800-222-0892 • Expedia Rate



**Economy/Coach flights**

included in price

5 people booked this property in the  
last 48 hours

**Viewed**

**4.7/5 Exceptional!**

(42 reviews)

**In high demand!**

**We have 2 left at**

**\$1,513**

Per person includes flight + hotel

**Sponsored**

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersement of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



## Luxury Houston hotel in The Galleria with 4 restaurants

### Popular highlights

Free WiFi

Outdoor pool

24-hour business center

24-hour front desk

Multilingual staff

### Location

Located in The Galleria, this luxury hotel is 0.3 mi (0.4 km) from Uptown Park and 2 mi (3.3 km) from Memorial Park. River Oaks District and Williams Tower are also within 1 mi (2 km).

### Hotel Features

This hotel features 4 restaurants, an outdoor pool, and a 24-hour fitness center. Free WiFi in public areas and a free area shuttle are also provided. Additionally, a bar/lounge, a poolside bar, and a coffee shop/café are onsite.


### Room Amenities

All 250 rooms offer free WiFi, 24-hour room service, and flat-screen TVs with satellite channels. Guests will also find minibars, premium bedding, and separate bathtubs and showers.

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersement of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.


**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.

	<b>Luxury Room, 2 Double Beds</b> <b>Max Occupancy:</b> 4 guests (up to 2 children) ✓ Earn 6,052 Expedia Rewards points <a href="#">Hide room information</a>	Only 2 rooms left at <b>+ \$0.00</b> per night Non-Refundable	<input type="button" value="Select"/>
	<p><b>2 Double Beds</b> 526 sq feet (48 sq meters)</p> <p><b>Internet</b> - Free WiFi  <b>Entertainment</b> - Flat-screen TV with premium channels  <b>Food &amp; Drink</b> - Coffee/tea maker, minibar, and 24-hour room service  <b>Sleep</b> - Premium bedding  <b>Bathroom</b> - Private bathroom, free toiletries, and a separate bathtub and shower  <b>Practical</b> - Safe, free newspaper, and iron/ironing board  <b>Comfort</b> - Air conditioning and daily housekeeping  Non-Smoking</p>		

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dissemination of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.

	<b>Luxury Room, 1 King Bed</b> <b>Max Occupancy:</b> 3 guests (up to 1 child) ✓ Earn 6,052 Expedia Rewards points <a href="#">Hide room information</a>	Only 2 rooms left at <b>+ \$0.00</b> per night Non-Refundable	<input type="button" value="Select"/>
	<p><b>1 King Bed</b> 526 sq feet (48 sq meters)</p> <p><b>Internet</b> - Free WiFi  <b>Entertainment</b> - Flat-screen TV with premium channels  <b>Food &amp; Drink</b> - Coffee/tea maker, minibar, and 24-hour room service  <b>Sleep</b> - Premium bedding  <b>Bathroom</b> - Private bathroom, free toiletries, and a separate bathtub and shower  <b>Practical</b> - Safe, free newspaper, and iron/ironing board  <b>Comfort</b> - Air conditioning and daily housekeeping  Non-Smoking</p>		

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail

1 to reasonably permit Plaintiff to assess independently whether the hotel or guest room  
2 meets his accessibility needs. Insufficient dispersement of accessible rooms.

3 **The manner in which the barriers denied Plaintiff full and equal use or access,**  
4 **and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and  
5 equal access by failing to identify and describe accessible features in the hotel and  
6 guest rooms in enough detail to reasonably permit Plaintiff to assess independently  
7 whether the hotel or guest room meets his accessibility needs.

8 **The dates on each particular occasion on which Plaintiff encountered such**  
9 **barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



11 **Executive Suite**

12 **Max Occupancy:** 3 guests (up to 1 child)

13 ✓ Earn 6,676 Expedia Rewards points

14 [Hide room information](#)

15 **+ \$104.03**

16 **Select**

17 per night

18 Non-Refundable

19 **1 King Bed**

20 526 sq feet (48 sq meters)

21 **Internet - Free WiFi**

22 **Entertainment - Flat-screen TV with premium  
23 channels**

24 **Food & Drink - Coffee/tea maker, minibar, and 24-  
25 hour room service**

26 **Sleep - Premium bedding**

27 **Bathroom - Private bathroom, free toiletries, and a  
28 separate bathtub and shower**

**Practical - Safe, free newspaper, and iron/ironing  
board**


**Comfort - Air conditioning and daily housekeeping**

**Non-Smoking**

18 **Identification of Specific Barrier in Plain Language:** Booking website does not  
19 identify and describe accessible features in the hotel and guest rooms in enough detail  
20 to reasonably permit Plaintiff to assess independently whether the hotel or guest room  
21 meets his accessibility needs. Insufficient dispersement of accessible rooms.

22 **The manner in which the barriers denied Plaintiff full and equal use or access,**  
23 **and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and  
24 equal access by failing to identify and describe accessible features in the hotel and  
25 guest rooms in enough detail to reasonably permit Plaintiff to assess independently  
26 whether the hotel or guest room meets his accessibility needs.


27 **The dates on each particular occasion on which Plaintiff encountered such**  
28 **barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.

	<b>Concierge Room, 1 King Bed</b> Max Occupancy: 3 guests (up to 1 child) ✓ Earn 7,300 Expedia Rewards points <a href="#">Hide room information *</a>	<b>+ \$208.07</b> per night Non-Refundable	<input type="button" value="Select"/>
	<p>1 King Bed 526 sq feet (48 sq meters)</p> <p>Internet - Free WiFi          Entertainment - Flat-screen TV with premium channels          Food &amp; Drink - Coffee/tea maker, minibar, and 24-hour room service          Sleep - Premium bedding          Bathroom - Private bathroom, free toiletries, and a separate bathtub and shower          Practical - Safe, free newspaper, and iron/ironing board          Comfort - Air conditioning and daily housekeeping          Non-Smoking</p>		

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.

	<b>Concierge Room, 2 beds</b> Max Occupancy: 4 guests (up to 2 children) ✓ Earn 7,300 Expedia Rewards points <a href="#">Hide room information *</a>	Only 2 rooms left at <b>+ \$208.07</b> per night Non-Refundable	<input type="button" value="Select"/>
	<p>2 Double Beds 526 sq feet (48 sq meters)</p> <p>Internet - Free WiFi          Entertainment - Flat-screen TV with premium channels          Food &amp; Drink - Coffee/tea maker, minibar, and 24-hour room service          Sleep - Premium bedding          Bathroom - Private bathroom, free toiletries, and a separate bathtub and shower          Practical - Safe, free newspaper, and iron/ironing board          Comfort - Air conditioning and daily housekeeping          Non-Smoking</p>		

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail

1 to reasonably permit Plaintiff to assess independently whether the hotel or guest room  
2 meets his accessibility needs. Insufficient dispersement of accessible rooms.

3 **The manner in which the barriers denied Plaintiff full and equal use or access,**  
4 **and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and  
5 equal access by failing to identify and describe accessible features in the hotel and  
6 guest rooms in enough detail to reasonably permit Plaintiff to assess independently  
7 whether the hotel or guest room meets his accessibility needs.

8 **The dates on each particular occasion on which Plaintiff encountered such**  
9 **barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**Concierge Executive Suite**  
Max Occupancy: 3 guests (up to 1 child)  
✓ Earn 7,612 Expedia Rewards points

Only 2 rooms left at  
**+ \$260.09**  
per night  
Non-Refundable

Select

[Hide room information x](#)

1 King Bed

526 sq feet (48 sq meters)

Internet - Free WiFi

Entertainment - Flat-screen TV with premium  
channels

Food & Drink - Coffee/tea maker, minibar, and 24-  
hour room service

Sleep - Premium bedding

Bathroom - Private bathroom, free toiletries, and a  
separate bathtub and shower

Practical - Safe, free newspaper, and iron/ironing  
board

Comfort - Air conditioning and daily housekeeping

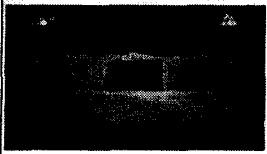
Non-Smoking

18 **Identification of Specific Barrier in Plain Language:** Booking website does not  
19 identify and describe accessible features in the hotel and guest rooms in enough detail  
20 to reasonably permit Plaintiff to assess independently whether the hotel or guest room  
21 meets his accessibility needs. Insufficient dispersement of accessible rooms.

22 **The manner in which the barriers denied Plaintiff full and equal use or access,**  
23 **and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and  
24 equal access by failing to identify and describe accessible features in the hotel and  
25 guest rooms in enough detail to reasonably permit Plaintiff to assess independently  
26 whether the hotel or guest room meets his accessibility needs.

27 **The dates on each particular occasion on which Plaintiff encountered such**  
28 **barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.





**Classic Suite**  
**Max Occupancy:** 3 guests (up to 1 child)  
 ✓ Earn 9,766 Expedia Rewards points  
[Hide room information](#)

Only 1 room left at  
**+ \$618.99**  
 per night  
 Non-Refundable

Select

**1 King Bed**

1042 sq feet (96 sq meters)

**Internet** - Free WiFi

**Entertainment** - Flat-screen TV with premium channels

**Food & Drink** - Coffee/tea maker, minibar, and 24-hour room service

**Sleep** - Premium bedding

**Bathroom** - Private bathroom, free toiletries, and a separate bathtub and shower

**Practical** - Safe, free newspaper, and iron/ironing board


**Comfort** - Air conditioning and daily housekeeping

Non-Smoking

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**Residential Suite**

Max Occupancy: 3 guests (up to 1 child)

✓ Earn 11,951 Expedia Rewards points

[Hide room information](#)

Only 3 rooms left at

**+ \$983.10**

per night

Non-Refundable

**Select**

**1 King Bed**

1047 sq feet (97 sq meters)

**Internet** - Free WiFi

**Entertainment** - Flat-screen TV with premium channels

**Food & Drink** - Coffee/tea maker, minibar, and 24-hour room service

**Sleep** - Premium bedding

**Bathroom** - Private bathroom, free toiletries, and a separate bathtub and shower

**Practical** - Safe, free newspaper, and iron/ironing board

**Comfort** - Air conditioning and daily housekeeping

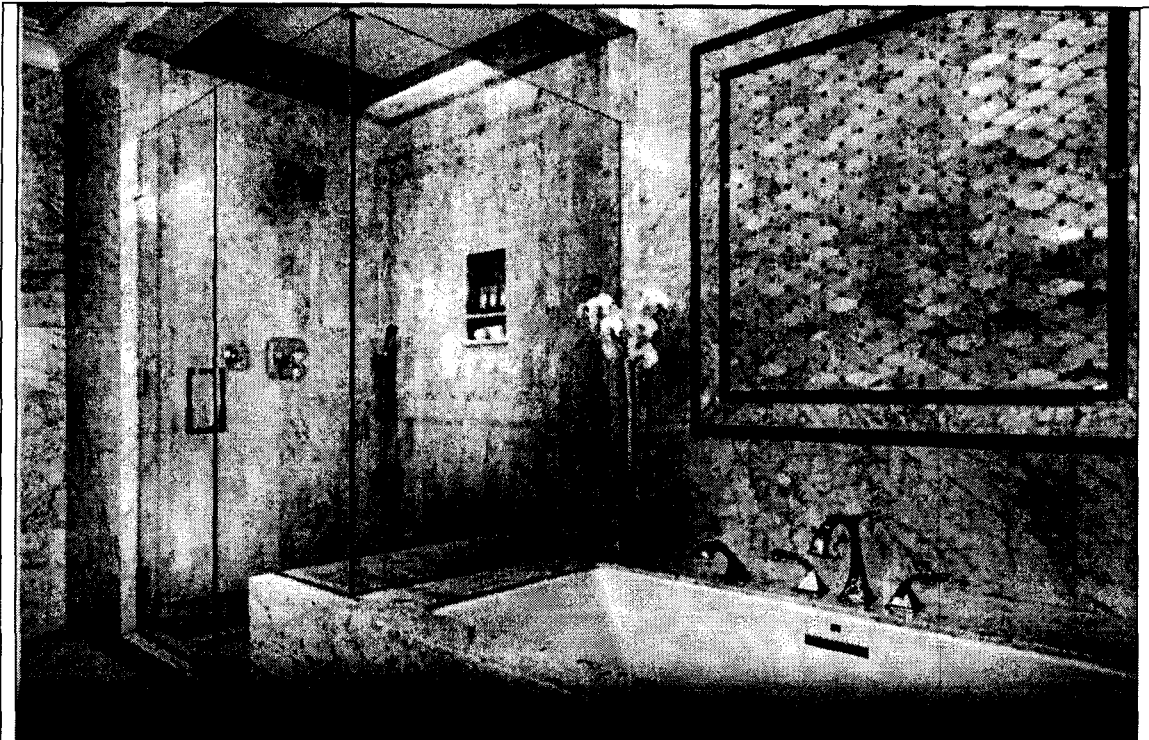
Non-Smoking

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersement of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.





**Identification of Specific Barrier in Plain Language:** Inaccessible bathtub.  
Inaccessible shower.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**Identification of Specific Barrier in Plain Language:** Inaccessible pool.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

1 **The dates on each particular occasion on which Plaintiff encountered such**  
2 **barrier and which deter Plaintiff from visiting Hotel: November 14, 2018.**



21 **Identification of Specific Barrier in Plain Language: Inaccessible pool.**

22 **The manner in which the barriers denied Plaintiff full and equal use or access,**  
23 **and which deter Plaintiff from visiting the Hotel: Barrier denied Plaintiff full and**  
24 **equal access by failing to identify and describe accessible features in the hotel and**  
25 **guest rooms in enough detail to reasonably permit Plaintiff to assess independently**  
26 **whether the hotel or guest room meets his accessibility needs.**

27 **The dates on each particular occasion on which Plaintiff encountered such**  
28 **barrier and which deter Plaintiff from visiting Hotel: November 14, 2018.**



**Identification of Specific Barrier in Plain Language:** Inaccessible bar and sitting area.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**Identification of Specific Barrier in Plain Language:** Unmarked passenger drop off area.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.

**1<sup>st</sup> PARTY BOOKING WEBSITE**

<https://www.thepostoakhotel.com/>

**No Accessibility Information**

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersement of accessible rooms.

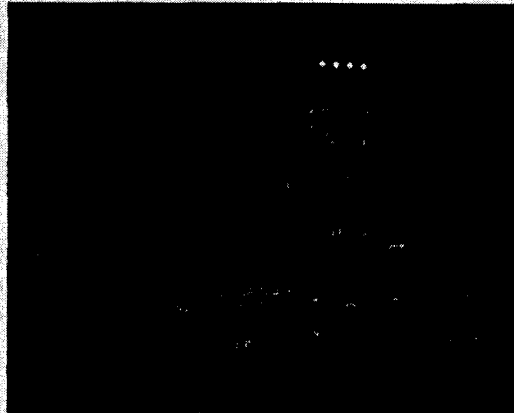
**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



# ABOUT US

Houston's newest luxury destination.



The Post Oak Hotel at Uptown Houston is the city's first elite destination for elegant accommodations masterfully blended with extensive conference space, prominent office space, designer fashion, signature dining and sophisticated amenities all in one tower. Indulge in sleek, modern comfort at The Post Oak Hotel, boasting an ultra-luxurious ambience coupled with an unrivalled experience with an international flare. Located in Uptown Houston, just steps away from The Galleria and River Oaks District, The Post Oak Hotel offers commanding views of downtown Houston and embraces every desire of savvy business and leisure travelers alike. Add the unmatched culinary excellence of Mastro's, the two-story Rolls Royce showroom and direct helicopter pad access and you will agree that The Post Oak Hotel is the ultimate in refinement and relaxation that is sure to satisfy even the

most discriminating taste. The Post Oak Hotel at Uptown Houston, a lavish experience so uniquely refined there can only be one.

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



## Luxury King or Double Queen Accommodations

Enter the world of unparalleled luxury in Houston that offers the most spacious and vibrant mix of sleek, ultra-modern design combined with unsurpassed views of the Houston skyline.

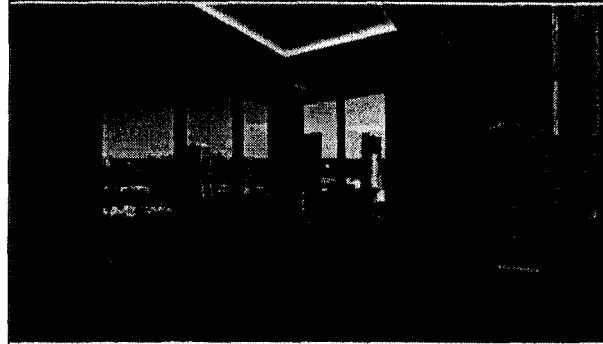
- 525 square foot Luxury King or Luxury Double Queen accommodations
- 300 count Egyptian cotton bed linens
- Full premium bar with Dean & DeLuca products
- Bluetooth connectivity for personal devices with sound and television
- Technogym personal wellness rack
- 50" Smart televisions in every room
- 111.27" television in the bathroom
- Nespresso Coffee maker with complimentary selection of coffee pods
- Five-Picture deluxe bathrooms
- Marble bathroom with dual vanities, soaking tub and separate shower
- Acqua Di Parma collection for bathroom amenities
- Oversized Egyptian cotton towels
- Complimentary wireless internet
- Nightly turndown service
- Handicap accessible options available

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and

equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel: November 14, 2018.**



#### Executive Suite with Multiple City Views

All of the unrivaled extravagance of the Luxury guestroom with panoramic views of the Houston skyline.

- 326 square foot Luxury King with multiple city views
- 500 count Egyptian cotton bed linens
- Full premium bar with Dean & DeLuca products
- Bluetooth connectivity for personal devices with sound and television
- Technogym personal wellness rack
- 30" Smart televisions in every room
- 11.22" television in the bathroom
- Nespresso Coffee maker with complimentary selection of coffee pods
- Five-Picture deluxe bathroom
- Marble bathroom with dual vanities, soaking tub and separate shower
- Acqua Di Parma collection for bathroom amenities
- Oversized Egyptian cotton towels
- Complimentary wireless internet
- Nightly turndown service
- Handicap accessible options available

STAY

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel: November 14, 2018.**



#### Luxury King or Double Queen Accommodations

Enter the world of unparalleled luxury in Houston that offers the most spacious and vibrant mix of sleek, ultra-modern design combined with unsurpassed views of the Houston skyline.

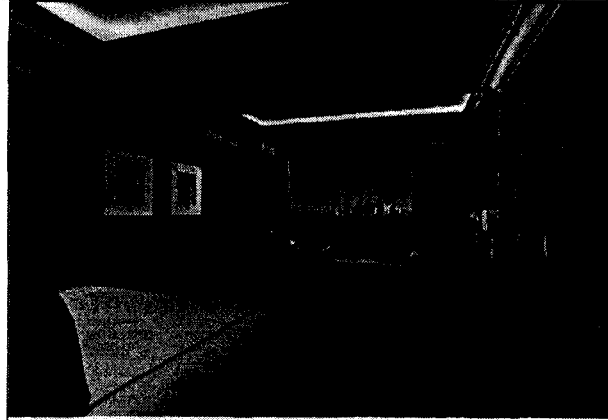
- 326 square foot Luxury King or Luxury Double Queen accommodations
- 500 count Egyptian cotton bed linens
- Full premium bar with Dean & DeLuca products
- Bluetooth connectivity for personal devices with sound and television
- Technogym personal wellness rack
- 30" Smart televisions in every room
- 11.22" television in the bathroom
- Nespresso Coffee maker with complimentary selection of coffee pods
- Five-Picture deluxe bathroom
- Marble bathroom with dual vanities, soaking tub and separate shower
- Acqua Di Parma collection for bathroom amenities
- Oversized Egyptian cotton towels
- Complimentary wireless internet
- Nightly turndown service
- Handicap accessible options available

STAY

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel: November 14, 2018.**



**Luxury King with Concierge Lounge Access**

Concierge level access, luxury accommodations that offers the most spacious and vibrant mix of sleek, ultra-modern design combined with unsurpassed views of the Houston skyline.

- 336 square foot Luxury King with Concierge Lounge Access
- Located on Floor 21, 22 and 23
- 500 count Egyptian cotton bed linens
- Full premium bar with Dean & DeLuca products
- Bluetooth connectivity for personal devices with sound and television
- Technogym personal wellness rack
- 30" Smart televisions in every room
- (1) 27" television in the bedroom
- Nespresso Coffee maker with complimentary selection of coffee pods
- Five-Fixture deluxe bathrooms
- Marble bathroom with dual vanities, soaking tub and separate shower
- Acqua Di Parma collection for bathroom amenities
- Oversized Egyptian cotton towels
- Complimentary wireless internet
- Nightly turndown service
- Handicap accessible options available

REDACTED

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersement of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel: November 14, 2018.**



**Executive Suite with Multiple City Views**

All of the unrivaled extravagance of the Luxury guestroom with panoramic views of the Houston skyline.

- 336 square foot Luxury King with multiple city views
- 500 count Egyptian cotton bed linens
- Full premium bar with Dean & DeLuca products
- Bluetooth connectivity for personal devices with sound and television
- Technogym personal wellness rack
- 30" Smart televisions in every room
- (1) 27" television in the bedroom
- Nespresso Coffee maker with complimentary selection of coffee pods
- Five-Fixture deluxe bathrooms
- Marble bathroom with dual vanities, soaking tub and separate shower
- Acqua Di Parma collection for bathroom amenities
- Oversized Egyptian cotton towels
- Complimentary wireless internet
- Nightly turndown service
- Handicap accessible options available

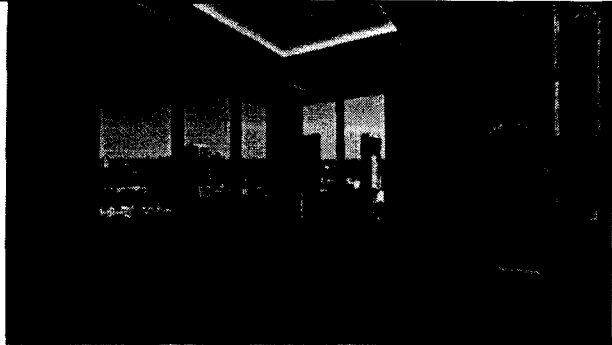
REDACTED

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersement of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel: November 14, 2018.**





**Executive Suite with Concierge Lounge Access**

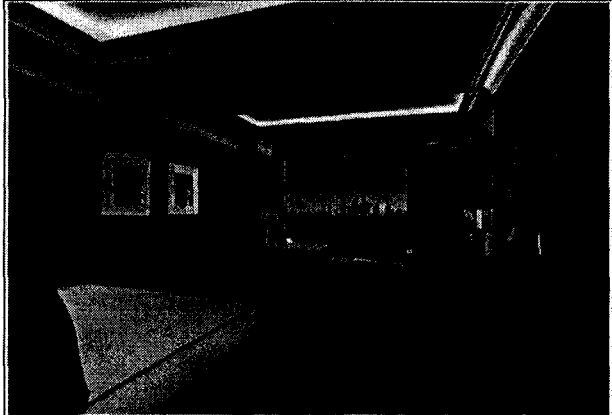
Concierge level access luxury accommodations coupled with the finest panoramic views of the Houston skyline.

- 526 square foot Luxury King or Double Queen with Concierge Lounge Access
- Located on Floors 21, 22 and 23
- 500 count Egyptian cotton bed linens
- Full premium bar with Dean & DeLuca products
- Bluetooth connectivity for personal devices with sound and television
- Technogym personal wellness rack
- 50" Smart televisions in every room
- (1) 27" television in the bathroom
- Nespresso Coffee maker with complimentary selection of coffee pods
- Five-Fixture deluxe bathrooms
- Marble bathroom with dual vanities, soaking tub and separate shower
- Acqua Di Parma collection for bathroom amenities
- Oversized Egyptian cotton towels
- Complimentary wireless internet
- Nightly turndown service
- Handicap accessible options available

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**Luxury King with Concierge Lounge Access**


Concierge level access, luxury accommodations that offers the most spacious and vibrant mix of sleek, ultra-modern design combined with unsurpassed views of the Houston skyline.

- 526 square foot Luxury King with Concierge Lounge Access
- Located on Floors 21, 22 and 23
- 500 count Egyptian cotton bed linens
- Full premium bar with Dean & DeLuca products
- Bluetooth connectivity for personal devices with sound and television
- Technogym personal wellness rack
- 50" Smart televisions in every room
- (1) 27" television in the bathroom
- Nespresso Coffee maker with complimentary selection of coffee pods
- Five-Fixture deluxe bathrooms
- Marble bathroom with dual vanities, soaking tub and separate shower
- Acqua Di Parma collection for bathroom amenities
- Oversized Egyptian cotton towels
- Complimentary wireless internet
- Nightly turndown service
- Handicap accessible options available

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**Executive Suite with Concierge Lounge Access**

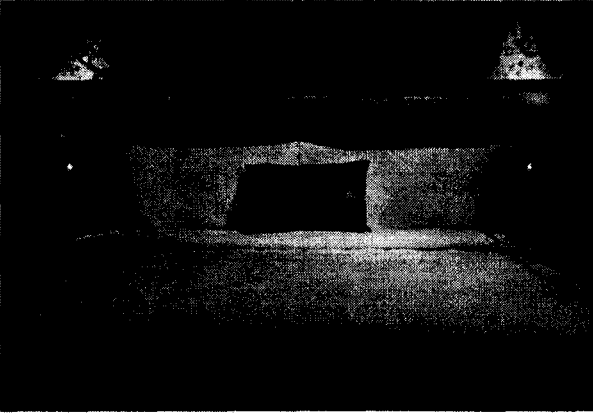
Concierge level access luxury accommodations coupled with the finest panoramic views of the Houston skyline

- 526 square foot Luxury King or Double Queen with Concierge Lounge Access
- Located on Floors 21, 22 and 23
- 300 count Egyptian cotton bed linens
- Full premium bar with Dean & DeLuca products
- Bluetooth connectivity for personal devices with sound and television
- Technogym personal wellness rack
- 50" Smart televisions in every room
- 11.27" television in the bathroom
- Nespresso Coffee maker with complimentary selection of coffee pods
- Five-Fixture deluxe bathrooms
- Marble bathroom with dual vanities, soaking tub and separate shower
- Acqua Di Parma collection for bathroom amenities
- Oversized Egyptian cotton towels
- Complimentary wireless internet
- Nightly turndown service
- Handicap accessible options available

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**One Bedroom King Suite with Concierge Lounge Access**

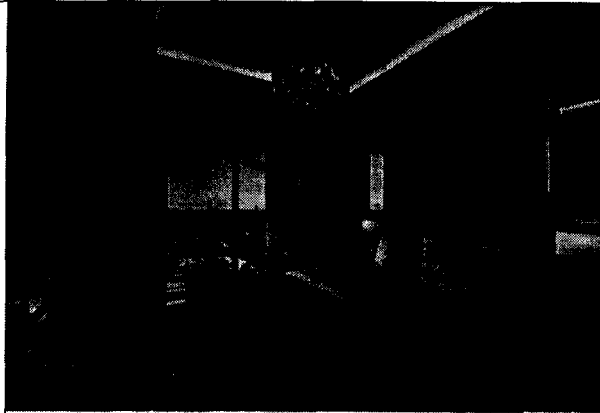
Added space for extra privacy in addition to all of the unrivaled extravagance of the Concierge level luxury accommodations

- 1007 SqFt - King Suite Room with Concierge Lounge Access
- Separate Living Area from Bedroom with Wet Bar
- 300 count Egyptian cotton bed linens
- Full premium bar with Dean & DeLuca products
- Bluetooth connectivity for personal devices with sound and television
- Technogym personal wellness rack
- 50" Smart televisions in every room
- 11.27" television in the bathroom
- Nespresso Coffee maker with complimentary selection of coffee pods
- Five-Fixture deluxe bathrooms
- Marble bathroom with dual vanities, soaking tub and separate shower
- Acqua Di Parma collection for bathroom amenities
- Oversized Egyptian cotton towels
- Complimentary wireless internet
- Nightly turndown service
- Handicap accessible options available

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**The Post Oak Suite**


This impressive 1,500 square-foot suite offers vast space for in-suite entertaining boasting a full kitchen and dining area as well as separate living space alongside of picturesque views of the Houston skyline.

- 1,500 Square Foot - One Bedroom King Suite Room located on the 22nd Floor
- Concierge Lounge Access
- Views of Downtown Houston
- Separate living area from bedroom
- Full kitchen and dining area
- Powder bathroom
- Walk-in closet
- 500 count Egyptian cotton bed linens
- Full premium bar with Dean & DeLuca products
- Bluetooth connectivity for personal devices with sound and television
- Technogym personal wellness rack
- (2) 50" Smart televisions in every room
- (1) 27" television in the bathroom
- Nespresso Coffee maker with complimentary selection of coffee pods
- Five-Picture deluxe bathrooms
- Marble bathroom with dual vanities, soaking tub and separate shower
- Acqua Di Parma collection for bathroom amenities
- Oversized Egyptian cotton towels
- Complimentary wireless internet
- Nightly turndown service
- Handicap accessible options available

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**Two Bedroom Presidential Suite**

Serving as Houston's unmatched, ultra-luxurious suites for visiting dignitaries, celebrities and the self-indulgent alike, the sophisticated and stylish Presidential Suite, which at 5,000 square feet is one of the largest of its kind in Houston. This two bedroom suite offers extra privacy and discretion with private elevator access, media room, exercise room, secluded terrace and much more.

Call for details.

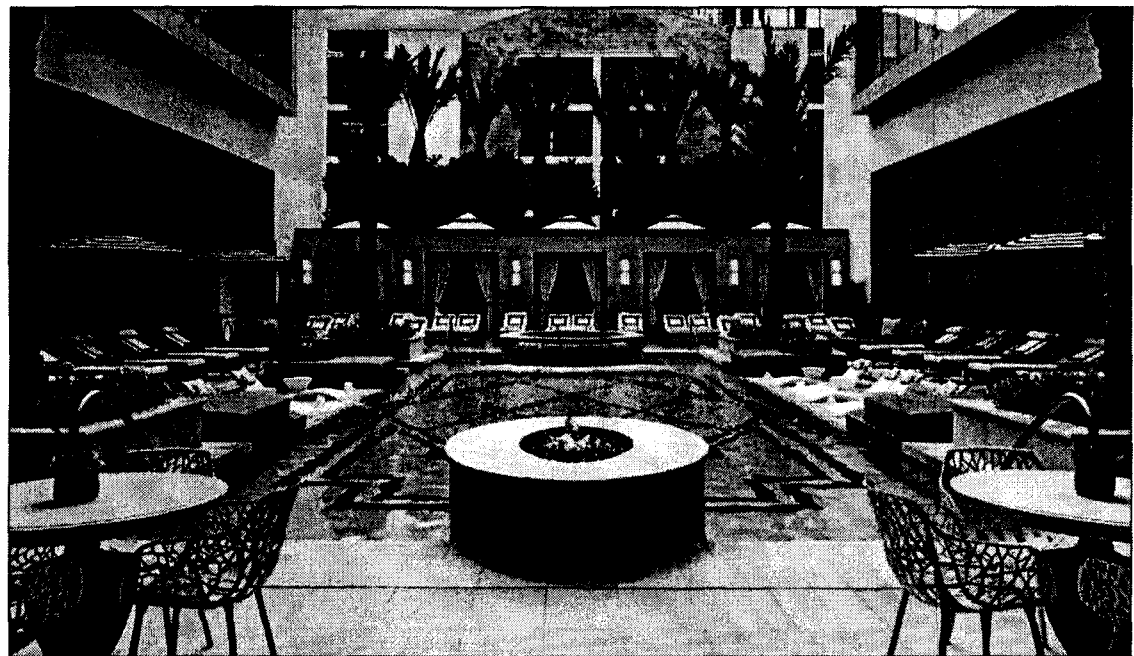
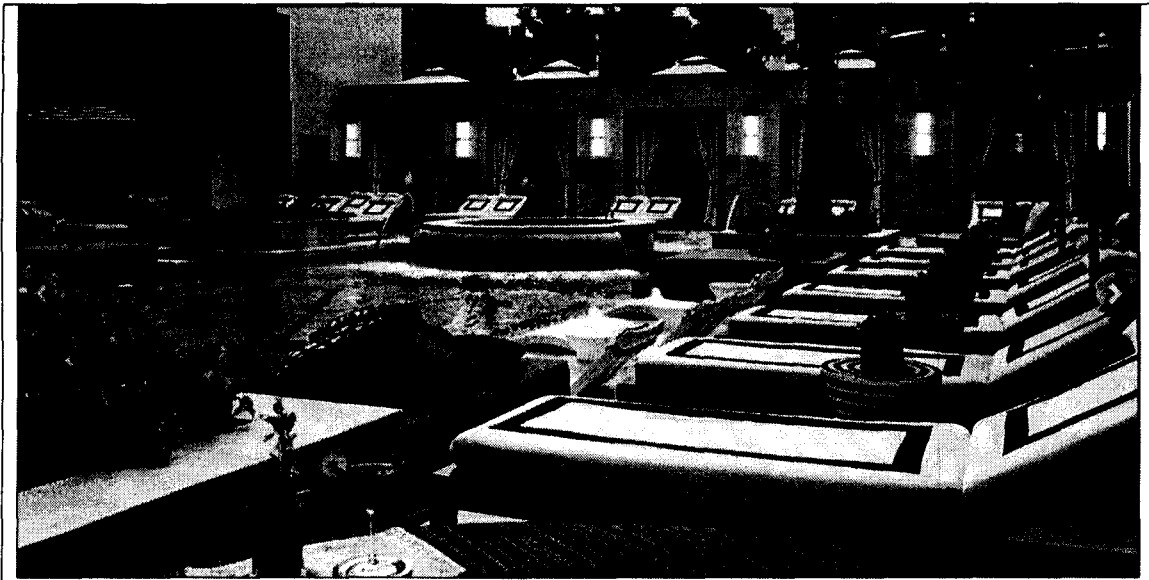
844.386.1625

**Identification of Specific Barrier in Plain Language:** Booking website does not identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs. Insufficient dispersment of accessible rooms.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.

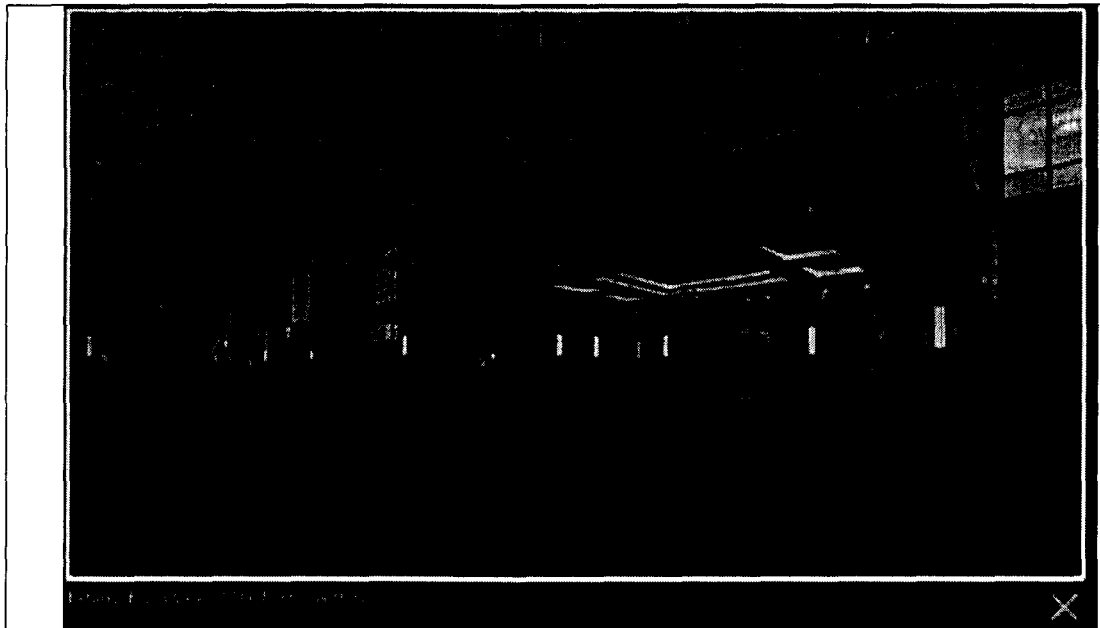




**Identification of Specific Barrier in Plain Language:** Inaccessible pool.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**Identification of Specific Barrier in Plain Language:** No marked drop off zone.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**Identification of Specific Barrier in Plain Language:** Inaccessible bar.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**Identification of Specific Barrier in Plain Language:** Inaccessible bar.

**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.



**Identification of Specific Barrier in Plain Language:** Inaccessible bar and seating.



**The manner in which the barriers denied Plaintiff full and equal use or access, and which deter Plaintiff from visiting the Hotel:** Barrier denied Plaintiff full and equal access by failing to identify and describe accessible features in the hotel and guest rooms in enough detail to reasonably permit Plaintiff to assess independently whether the hotel or guest room meets his accessibility needs.

**The dates on each particular occasion on which Plaintiff encountered such barrier and which deter Plaintiff from visiting Hotel:** November 14, 2018.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# TRAVELING WITH PETS

First-class services for pampered pooches.



At the Post Oak Hotel, four-legged visitors are treated to the same first-class service and experiences as their owners. Pampered pooch amenities include plush pet beds, bowls and dishware, and a pet-friendly in-room dining menu featuring chef-crafted Roasted Chopped Filet Mignon, Salmon & Eggs Scramble, and Benne 'n le Bark.

**Pet Policy:** We welcome dogs weighing up to 100 pounds. A \$150 cleaning fee with a signed waiver applies. Other pets must be approved by the General Manager.

**First Class for Pampered Pooches, No Class for the Disabled**

END